

March 12, 2025

By ECF

Judge Jennifer L. Rochon
Daniel Patrick Moynihan United States Courthouse
Courtroom 20B
500 Pearl Street
New York, NY 10007-1312

Re: Heilbut, et al. v. Cassava, et al., Case No. 24:cv-05948-JLR

Dear Judge Rochon,

We write on behalf of Plaintiffs Drs. Adrian Heilbut, Enea Milioris, and Jesse Brodkin to request the provisional sealing of their forthcoming response to Defendants' letter-motion filed on Monday, March 10, 2025, at Docket Number 68 and sealed by order of the Court at Docket Number 69.

Plaintiffs do not believe that any governing law or rule supports the continued sealing of either Defendants' letter (other than Exhibit C thereto, which contains a specific settlement offer we conveyed pursuant to a confidentiality agreement with Cassava) or our own responsive letter. Rather, we seek provisional sealing only to conform with the Court's Order of yesterday's date and to allow the Court maximum flexibility in entering whatever further order it deems appropriate upon consideration of the letters from all parties.

We are, of course, available to discuss at the Court's convenience if desired.

Respectfully submitted,
/s/ Isaac B. Zaur
Isaac B. Zaur